**Regulatory Impact Analysis**

*COMMENT: It would increase transparency if EPA could do a separate benefit run (similar to what is in Section 5 Appendix) that shows the potential disbenefits that would accrue under the alternative assumption that the statutorily required increases in prescribed burns come to pass as well as the estimated increase in the rate of wildfires*

RESPONSE: Developing new projections of prescribed burning emissions would rely on receiving information about how prescribed fire activity will change on the lands of public and private landowners in the future. Information would be needed on the location and number of acres planned to burn, the time of year, time of day, and the types of weather conditions that would conform to prescribed burning. Developing and testing of new prescribed burning emission projections and impacts would then need to be performed. The appropriateness of the projections for the purposes of the RIA would then need to be considered. We acknowledge that the RIA is an illustrative analysis and the influence of potential increases in prescribed burning emissions may require additional consideration during implementation. Prescribed fires that meet the procedural and technical requirements of the Exceptional Events Rule could also qualify as exceptional events. Emissions from wildfires that cause monitored exceedances or violations of a NAAQS can be excluded from the data set used to support certain regulatory decisions if an air agency prepares and submits a demonstration that meets the procedural and technical requirements of the Exceptional Events Rule.

*COMMENT: EPA could use the rate of increase in wildfires over the last five to 10 years to estimate rates in the next 10 years and use the air quality monitoring results in Table 2A-7 to estimate ambient concentrations to indicate which counties might not be in attainment using the alternative assumptions or the maps provided by interagency reviewers may be of value for this analysis.*

RESPONSE: EPA has estimated the number of areas anticipated to reach (and not reach) alternative standard levels using methods appropriate for the purposes of the RIA. Also, it is not clear how the proposed approach would represent the spatial/temporal variability in wildfire activity or how that activity would be used to estimate changes in design values. We acknowledge that the RIA is an illustrative analysis and the influence of potential increases in wildfire emissions may require additional consideration during implementation. The identification of attainment and nonattainment areas is accomplished in implementing a promulgated standard using actual monitored air quality data. In parallel with the initial area designations process, air agencies can prepare exceptional events demonstrations that meet the procedural and technical requirements of the Exceptional Events Rule for wildfires and prescribed fires on wildland that cause an exceedance or violation of the promulgated NAAQS. If EPA concurs with these submitted demonstrations, the event-influenced data will be removed from the data set used to determine the attainment status of a given area and could make the difference between designating the area as attaining the standard or not attaining the standard.